

# ADVISORY:

## Financial Action Task Force public statement on high-risk jurisdictions that are subject to a call for action – June 2024

**1 July 2024** - The Financial Action Task Force (FATF) identifies high-risk jurisdictions that have significant strategic deficiencies in their regimes to counter money laundering, terrorist financing, and financing of proliferation of weapons of mass destruction.

The FATF regularly issues public statements in respect of high-risk jurisdictions, calling on its members and urging other jurisdictions to apply *enhanced due diligence*, and in the most serious cases to apply *countermeasures*, to protect the international financial system from the ongoing money laundering, terrorist financing, and proliferation financing risks emanating from those high-risk jurisdictions.

The FATF published the latest such statement on its website on 28 June 2024. In this statement the FATF identifies the Democratic Republic of Korea (DPRK), the Islamic Republic of Iran (Iran) and Myanmar as high-risk jurisdictions. The statement can be accessed [here](#).

### Democratic People's Republic of Korea

Building upon the FATF statements over the past decade, the FATF remains concerned by the DPRK's continued failure to address the significant deficiencies in its anti-money laundering and combating the financing of terrorism (AML/CFT) regime and the serious threats posed by the DPRK's illicit activities related to the proliferation of weapons of mass destruction (WMDs) and its financing.

The FATF has continually reiterated since 2011 the need for all countries to robustly implement the targeted financial sanctions in accordance with UNSC Resolutions and apply the following countermeasures to protect their financial systems from the money

laundering, terrorist financing, and proliferation financing threat emanating from the DPRK:

- Terminate correspondent relationships with DPRK banks;
- Close any subsidiaries or branches of DPRK banks in their countries; and
- Limit business relationships & financial transactions with DPRK persons.

Despite these calls, the DPRK has increased its connectivity with the international financial system, which raises proliferation financing risks, as the FATF noted in February 2024. This requires greater vigilance and renewed implementation and enforcement of these countermeasures against the DPRK. As set out in UNSCR 2270 (2026), the DPRK frequently uses front companies, shell companies, joint ventures and complex, opaque ownership structures for the purpose of violating sanctions.

The FATF urges countries to adequately assess and account for the increased proliferation financing risk with the greater financial connectivity reported. The ability to obtain reliable and credible information to support the assessment of proliferation financing risks relating to the DPRK is hampered by the recent termination of the mandate of the 1718 Committee Panel of Experts. Thus, the FATF will monitor the measures to comply with the DPRK targeted financial sanctions and the implementation of countermeasures against the DPRK.

**The Financial Intelligence Centre (FIC) therefore advises** accountable institutions that these risks in respect of the DPRK, in particular the DPRK's ability to facilitate transactions on its behalf, expose institutions engaging with counterparts in the DPRK to the possibility of involvement in transactions that may relate to the financing of the proliferation of weapons of mass destruction.

With these risks in mind, accountable institutions are advised to apply enhanced due diligence to business relationships and transactions with entities in the DPRK and their intermediaries. The FIC also advises accountable institutions not to rely on third parties to provide the information that they require in conducting enhanced customer due diligence in this context.

In addition, the FIC advises accountable institutions and all businesses to enhance their ability to identify and report suspicious and unusual transactions or actions under

section 29 of the Financial Intelligence Centre Act, 2001 (Act 38 of 2001, the FIC Act), taking into account the abovementioned risks.

The FIC further advises accountable institutions to terminate correspondent relationships with DPRK financial institutions where this is required by relevant UNSC Resolutions.

The FIC reminds institutions of their targeted financial sanctions obligations pursuant to sections 26A to 26C of the FIC Act, in respect of the DPRK and draws attention to PCC 44A, issued on 29 February 2024, for further guidance on the application of these sanctions. In particular, the FIC reiterates that the prohibitions relating to targeted financial sanctions are absolute and must be applied by all persons in respect of all sanctioned person and entities.

## **Islamic Republic of Iran**

In June 2016 the Iran started a process to address strategic deficiencies in its measures against money laundering and terrorist financing according to an agreed action plan. In February 2020, the FATF noted Iran has not completed the action plan.

In October 2019 the FATF called upon its members and urged all jurisdictions to: require increased supervisory examination for branches and subsidiaries of financial institutions based in Iran; introduce enhanced relevant reporting mechanisms or systematic reporting of financial transactions; and require increased external audit requirements for financial groups with respect to any of their branches and subsidiaries located in Iran.

The FATF lifted the suspension of countermeasures fully in February 2020, as Iran had failed to enact the Palermo and Terrorist Financing Conventions in line with the FATF Standards at the time and called on its members and urged all jurisdictions to apply effective countermeasures to mitigate the risks emanating from the abovementioned deficiencies.

The FATF will maintain mention of Iran in its statement on high-risk jurisdictions that are subject to a call for action until the full action plan mentioned above has been completed. If Iran ratifies the Palermo and Terrorist Financing Conventions, in line

with the FATF standards, the FATF will decide on next steps, including whether to suspend countermeasures.

Until Iran implements the measures required to address the deficiencies identified with respect to countering terrorism-financing in the Action Plan, the FATF will remain concerned with the terrorist financing risk emanating from Iran and the threat this poses to the international financial system.

**The FIC therefore advises** accountable institutions to consider the risks identified by the FATF in relation to Iran when entering into business relationships or conducting transactions with persons and entities in Iran and to apply enhanced due diligence (including those suggested by the FATF) in this regard, especially where there may be an increased risk of terrorist financing.

In this context the FIC advises accountable institutions to limit engagements in new business relationships or transactions with persons and entities in Iran to those where institutions are confident that they can manage the attendant money laundering and terrorist financing risks. The FIC also advises accountable institutions not to rely on third parties located in Iran to provide information they require in conducting customer due diligence.

In addition, the FIC advises accountable institutions and all businesses to enhance their ability to identify and report suspicious and unusual transactions or actions under section 29 of the Financial Intelligence Centre Act, 2001 (Act 38 of 2001, the FIC Act), taking into account the abovementioned risks.

The FATF's statement and this advisory do not imply that institutions are prohibited from engaging in transactions involving financial institutions domiciled in Iran, but when they do so they should ensure that the due diligence applied is commensurate with the risks posed by above-mentioned strategic deficiencies and that they are able to meet the reporting requirements of the FIC Act.

## Myanmar

In February 2020, Myanmar committed to address its strategic deficiencies. However, Myanmar's action plan expired in September 2021 with the majority of its action items still not addressed. Given the continued lack of progress, the FATF decided in February 2023 that further action was necessary in line with its procedures. The FATF then called on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risk arising from Myanmar. The FATF also pointed out that countries should ensure that flows of funds for humanitarian assistance, legitimate NPO activity and remittances are not disrupted, when applying enhanced due diligence measures.

Myanmar should continue to work on implementing its action plan to address these deficiencies, including by: (1) demonstrating an improved understanding of money laundering risks in key areas; (2) demonstrating that hundi operators are registered and supervised; (3) demonstrating enhanced use of financial intelligence in law enforcement authorities' investigations, and increasing operational analysis and disseminations by the financial intelligence unit; (4) ensuring that money laundering is investigated and prosecuted in line with risks; (5) demonstrating investigation of transnational money laundering cases with international cooperation; (6) demonstrating an increase in the freezing/seizing and confiscation of criminal proceeds, instrumentalities, and/or property of equivalent value; (7) managing seized assets to preserve the value of seized goods until confiscation; and (8) addressing technical compliance deficiencies related to Recommendation 7 to ensure effective implementation of targeted financial sanctions related to proliferation financing.

The FATF urges Myanmar to work to fully address its AML/CFT deficiencies, including to demonstrate that its monitoring and supervision of money or value transfer services (MVTs) is based on documented and sound understanding of ML/TF risks to mitigate undue scrutiny of legitimate financial flows.

**The FIC therefore advises** accountable institutions to consider the risks identified by the FATF in relation to Myanmar when entering into business relationships or conducting transactions with persons and entities that have links to Myanmar and to apply enhanced due diligence in this respect. When applying enhanced due diligence

measures, accountable institutions should ensure that flows of funds for humanitarian assistance, legitimate activities of non-profit organisations and remittances are not disrupted.

The FATF's statement and this advisory do not imply that institutions are prohibited from engaging in transactions involving financial institutions domiciled in Myanmar, but when they do so they should ensure that the due diligence applied is commensurate with the risks posed by above-mentioned strategic deficiencies and that they are able to meet the reporting requirements of the FIC Act.

For more information on these and other matters relating to the work of the FATF please visit <https://www.fatf-gafi.org/en/home.html>.

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